

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

KIM K. SUMNER,

Plaintiff,

v.

CIVIL ACTION NO. 1:13-cv-00539

**MARYLAND JUDICIARY /
DISTRICT COURT OF MARYLAND,**

Defendant.

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**PLAINTIFF'S MOTION TO ENLARGE TIME
FOR FILING RULE 26(f) REPORT**

Plaintiff, Kim K. Sumner, by her undersigned counsel, moves for an additional extension of one week, from November 19 to Tuesday, November 26, 2013, for the parties to file the joint report of their F.R.Civ.P. 26(f) meeting, including a resulting discovery plan and a proposed master schedule of events expected to occur in the above-captioned action.

Undersigned counsel believes that substantial progress has been made toward agreement on most aspects of the subject report, with the exception of the scope of Plaintiff's proposed discovery, and counsel's disagreement on that subject can be dealt with as discovery issues actually arise. But because of the respective demands upon counsel, it appears that the additional discussion that is necessary for concurrence as to the final content of the subject report may not be accomplished in time for filing of the report in accord with the present deadline of November 19.¹

¹ Defendant's counsel, Michele J. McDonald, Assistant Attorney General, informed undersigned counsel that discussion of Plaintiff's most recent proposals could be not accomplished until "very late" on November 19, and undersigned counsel has an early

WHEREFORE, Plaintiff requests that the current deadline for filing the parties' joint Rule 26(f) report be enlarged to on or before Tuesday, November 26, 2013.

Date: November 19, 2013.

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of November, 2013, a copy of the instant motion was sent by electronic transmission to Douglas Gansler, Maryland State Attorney General, 200 St. Paul Street, Baltimore, Maryland 21202 and to Michele J. McDonald, Esquire, Assistant Attorney General, 200 St. Paul Street, Baltimore, Maryland 21202.

/s/

Gerardine M. Delambo

commitment on November 20. Hence the instant, precautionary motion, which Defendant's counsel invited undersigned counsel to file. In any event, undersigned counsel will attempt to obtain Defendant's counsel's explicit concurrence in the instant motion.